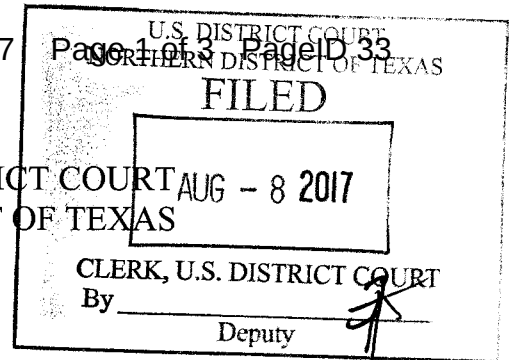


ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

KAMYAR JAHANRAKHSAN  
also known as KAMYAR JAHAN RAKHSAN;  
ANDY or ANDREW RAKHSAN; ANDY or  
ANDREW KAMYAR (or KAMIAR or KAMIER)  
RAKHSAN

NO.

**3-17CR-414-N**

The Grand Jury Charges:

INDICTMENT

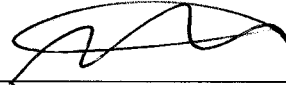
Count One

Knowingly Causing the Transmission of a Command to a Protected Computer  
(18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B)))

Between on or about December 30, 2014, and on or about January 25, 2015, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Kamyar Jahanrakhshan, also known as Kamyar Jahan Rakhshan; Andy or Andrew Rakhshan; Andy or Andrew Kamyar (or Kamiar or Kamier) Rakhshan** knowingly caused the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused damage without authorization to a protected computer; in that the defendant knowingly caused a denial of service attack on the website Leagle.com, and by said transmission caused a loss aggregating at least \$5,000 or more during a one-year period.


In violation of 18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B)).

A TRUE BILL:



FOREPERSON

JOHN R. PARKER  
UNITED STATES ATTORNEY



CANDINA S. HEATH  
Assistant United States Attorney  
Northern District of Texas  
Texas State Bar No. 09347450  
1100 Commerce Street, 3rd Floor  
Dallas, Texas 75242  
Telephone: 214-659-8600  
Facsimile: 214-659-8805  
candina.heath@usdoj.gov

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

KAMYAR JAHAN RAKHSHAN  
also known as KAMYAR JAHAN RAKHSHAN;  
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INDICTMENT

18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B))  
Knowingly Causing the Transmission of a Command to a Protected Computer

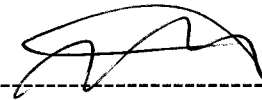
1 Count

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A true bill rendered

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DALLAS



FOREPERSON

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Filed in open court this 8th day of August, 2017.

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**Defendant in Federal Custody since  
July 26, 2017 Seattle, Washington**

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UNITED STATES MAGISTRATE JUDGE  
Magistrate Court Number: 3:16-MJ-635-BK